

EXHIBIT D

KAMRAN SHAFIEI 30b6
SINGULAR COMPUTING LLC V. GOOGLEJuly 20, 2021
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IN THE UNITED STATES DISTRICT COURT	1 - - -
DISTRICT OF MASSACHUSETTS	2 I N D E X
CASE NO.: 1:19-CV-12551-FDS	3 - - -
SINGULAR COMPUTING LLC,	4
Plaintiff,	5 WITNESS: DIRECT CROSS REDIRECT RECROSS
-vs-	6
GOOGLE LLC,	7 KAMRAN SHAFIEI
Defendant.	8 BY MR. ERCOLINI: 21
	9
SCHEDULED REMOTE VIDEOTAPED DEPOSITION OF	10
KAMRAN SHAFIEI	11
VIA ZOOM PLATFORM	12
Tuesday, July 20, 2021	13
9:27 - 9:47 a.m. Pacific	14
WITNESS LOCATION:	15
Los Gatos, California 95032	16
Reported By:	17
Wendy Beath Anderson, RDR, CRR, CRC	18
Notary Public, State of Florida	19
Esquire Deposition Services	20
West Palm Beach Office Job #J7282555	21
	22
	23
	24
	25
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1 APPEARANCES:	1 P R O C E E D I N G S
2 On behalf of the Plaintiff:	2 - - -
3 MICHAEL J. ERCOLINI, ESQUIRE	3 Deposition taken before Wendy Beath Anderson,
4 PRINCE LOBEL TYE, LLP	4 Registered Diplomate Reporter, Certified Realtime
5 One International Place, Suite 3700	5 Reporter and Notary Public in and for the State of
6 Boston, Massachusetts 02110	6 Florida at Large, in the above cause.
7 mercolini@princelobel.com	7 - - -
8 On behalf of the Defendant:	8 THE VIDEOGRAPHER: Good morning. We are now
9 MICHELLE YBARRA, ESQUIRE	9 on the record. The time is now 11:00 -- sorry --
10 CHRISTOPHER SUN, ESQUIRE	10 9:27 a.m. Pacific time on Tuesday, July 20th, 2021.
11 KEKER VAN NEST & PETERS, LLP	11 This begins the videotaped deposition of Mr. Kamran
12 633 Battery Street	12 Shafiei taken in the matter of Singular Computing
13 San Francisco, California 94111	13 LLC, versus Google LLC.
14 mybarra@keker.com	14 The videographer today is myself, Carlos
15 ALSO PRESENT:	15 Andreu, and the court reporter is Wendy Anderson.
16 JENNIFER POLSE, ESQUIRE, GOOGLE IN-HOUSE COUNSEL	16 We are both representing Esquire Deposition
17 CHRIS MADDEN, HOFFMAN ALVARY	17 Solutions.
18	18 Counsel, will you please announce your name
19	19 and whom you represent, after which the court
20	20 reporter will swear in the witness. You may
21	21 proceed.
22	22 MR. ERCOLINI: Michael Ercolini of Prince
23	23 Lobel Tye in Boston for the plaintiff, Singular
24	24 computing, LLC.
25	25 MS. YBARRA: Michelle Ybarra from Kecker Van

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<p style="text-align: right;">Page 5</p> <p>1 Nest and Peters for defendant, Google. 2 MR. SUN: Christopher Sun from Kecker Van Nest 3 and Peters for defendant, Google. 4 (Witness sworn by the court reporter.) 5 THE WITNESS: I do. 6 MS. YBARRA: Before we begin the examination 7 today, it's important that we clarify some things 8 on the record regarding the scope of Mr. Shafiei's 9 deposition testimony today. 10 As Mr. Ercolini knows, Mr. Shafiei has been 11 designated to testify on Topics 10, 11, 12, 13, 18, 12 20 to 25 and 30, consistent with the scope set 13 forth in Exhibit D to the declaration of Andrew 14 Brunz in support of Google's June 21st opposition 15 to Singular's motion to compel. 16 At the June 30th hearing on that motion, Judge 17 Cabell ordered Google to provide a witness on 18 Topic 36, which Mr. Shafiei is also prepared to 19 testify on and Google discussed the substance of 20 the June 30th hearing with Singular in numerous 21 letters and memorialized Google's agreement to 22 produce Mr. Shafiei on these topics in a 23 July 2nd letter to Singular. 24 Until yesterday, Singular never raised any 25 disagreement regarding the scope of the topics for</p>	<p style="text-align: right;">Page 7</p> <p>1 informs Google it intends to put Mr. Shafiei up for 2 deposition only once and only on the scope of the 3 topics reflected in the chart filed with the Court, 4 which Singular never disputed and, in fact, 5 represented to Judge Cabell at the hearing 6 reflected the resolution of the parties' dispute. 7 Singular's refused to limit its deposition of 8 Mr. Shafiei to the deposition topics and the scope 9 previously agreed on by the parties and discussed 10 with the Court. 11 Mr. Shafiei's cleared his schedule today. 12 He's prepared to testify on the topics I identified 13 earlier as limited in the chart provided by the 14 Court, plus Topic 36, but we're prepared to proceed 15 with the deposition today only upon Singular's 16 confirmation that Mr. Ercolini will limit his 17 questions properly to the scope of the topics as 18 agreed to and discussed with the Court and not seek 19 additional time with Mr. Shafiei or any 30(b)(6) 20 witness on those same topics later. 21 Absent that agreement, we intend to suspend 22 today's deposition and seek immediate guidance from 23 Judge Cabell on this new dispute which we had 24 thought was put to bed weeks ago. I've asked 25 Mr. Ercolini to provide for me --</p>
<p style="text-align: right;">Page 6</p> <p>1 which Mr. Shafiei's been designated and Singular 2 never indicated any intent to renege on positions 3 it took before the Court at the June 30th hearing. 4 Yet, last night Mr. Ercolini informed Google for 5 the first time of Singular's new position that 6 Mr. Shafiei should be prepared to address the full 7 scope of those topics as drafted, notwithstanding 8 Judge Cabell's clear ruling on the record at the 9 June 30th hearing that several of those topics as 10 drafted are overbroad and improper. And I'm 11 referring specifically to, for example, Topic 18, 12 which seeks 30(b)(6) testimony on P&L statements of 13 any product or business segment responsible or 14 formally responsible for the accused services. 15 Judge Cabell said explicitly that the topic as 16 drafted is too out there and, quote, too broad. 17 Singular's e-mail last night sent the night 18 before Mr. Shafiei's deposition demanding that 19 Mr. Shafiei testify on the full scope of that topic 20 and others completely disregard the guidance from 21 Judge Cabell. 22 MR. ERCOLINI: Can we hurry this up? 23 MS. YBARRA: Let me finish, Mr. Ercolini, 24 please. 25 Upon receiving Singular's e-mail, Singular</p>	<p style="text-align: right;">Page 8</p> <p>1 MR. ERCOLINI: This is my deposition -- 2 MS. YBARRA: Mr. Ercolini, I'm almost done. 3 Please stop interrupting me. 4 MR. ERCOLINI: I'm going to give you another 5 minute. 6 MS. YBARRA: Let me finish. 7 MR. ERCOLINI: I'm going to give you another 8 minute. 9 MS. YBARRA: Mr. Ercolini, I asked you to 10 provide that confirmation before you began your 11 examination. You refused to provide it over 12 e-mail. I'm asking you to provide it here on the 13 record. If you don't agree, state your -- the 14 basis for your position, your disagreement and then 15 we should go off the record and contact the Court. 16 MR. ERCOLINI: So the rule is that if I notice 17 a deposition, you have to appear for it. Absent a 18 protective order that's in place or you're seeking 19 a protective order or you sought a protective 20 order, you have to produce a witness. If you don't 21 do it, you can be sanctioned. 22 If you're telling me you're going to suspend 23 the deposition and you're going to refuse to 24 produce the witness on the topics which he's been 25 designated on, that's up to you, but I'm going to</p>

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<p style="text-align: right;">Page 9</p> <p>1 respond to a few of the things that you said. 2 First of all, the exhibit that you're 3 referring to was an exhibit that was attached to an 4 opposition to a motion to compel. At no point 5 during the hearing did Singular abandon any topics, 6 as was suggested last evening. We've made clear 7 what we were seeking. We never abandoned any of 8 the topics. I take issue with everything that's 9 been said about what Judge Cabell said during that 10 hearing. He did not exclude any topics. He 11 certainly didn't draft that exhibit, as you just 12 suggested, which is off the wall. 13 If Mister -- if you're telling me that 14 Mr. Shafiei is not prepared to testify on the 15 topics on which he's been designated today, that's 16 fine. If you choose to present the witness without 17 his answering questions, I'm going to take that as 18 failing to appear, but I would like to get 19 questions in today. 20 I'm not going to waive any right to redepose 21 Mr. Shafiei if he's unprepared for topics today. 22 I'm not going to waive any right to take witnesses 23 on the 30(b)(6) topics that we've provided. 24 So if you're telling me that you're going to 25 yank the witness because we've not agreed to waive</p>	<p style="text-align: right;">Page 11</p> <p>1 MS. YBARRA: We are going to suspend the 2 deposition today in light of Singular's refusal to 3 abide by the agreements and comply with the 4 guidance provided by Judge Cabell at the June 30th 5 hearing, and I will note for the record -- please, 6 Mr. Ercolini, I see you're eager to jump in there, 7 but let me finish my sentence and then you can 8 state your response. 9 I will note for the record that Singular's 10 reneging on agreements that the parties had reached 11 weeks after the parties memorialized those in 12 writing. It is improper and itself sanctionable 13 conduct. 14 MR. ERCOLINI: I want you to point me to 15 exactly where we agreed to the limitations that 16 you're proposing. All I asked for last evening, 17 and I want to make this absolutely clear, is for 18 you to confirm which portions of which topics 19 Mr. Shafiei was going to be prepared to testify on 20 today. You did not do that. I asked you three 21 separate times. You still cannot do it. 22 We can sit here right now and you can tell me 23 what portions of the topics he's prepared to 24 testify on and that's it. We'll move forward on 25 those. But I asked that three separate times, did</p>
<p style="text-align: right;">Page 10</p> <p>1 that right, that's up to you. I'm going to take 2 that as a failure to appear. We will move for 3 sanctions and we can take it from there. 4 But I really would like to get the deposition 5 underway, if we can. 6 MS. YBARRA: Are you finished, Mr. Ercolini? 7 MR. ERCOLINI: I am. 8 MS. YBARRA: I disagree with your 9 characterization of the record and my statements, 10 and I didn't suggest Judge Cabell off the chart -- 11 MR. ERCOLINI: You said -- 12 MS. YBARRA: Mr. Ercolini, would you stop 13 interrupting me, please. It's improper and it's 14 rude and it makes hard for the court reporter to 15 take a proper record here. Let me finish. 16 MR. ERCOLINI: This is not your deposition. 17 So if you want to keep grandstanding, you're going 18 to do it on mute. 19 MS. YBARRA: Mr. Ercolini, are you done 20 interrupting me? 21 MR. ERCOLINI: I've had it. You've had about 22 five minutes of uninterrupted jabbering. I'm done. 23 So if you want to yank the witness, yank the 24 witness. That's up to you. But I'm not going to 25 sit here through speaking objections.</p>	<p style="text-align: right;">Page 12</p> <p>1 not hear anything back and I've not seen a single 2 thing where we agreed to limit the scope of the 3 topics, and in a completely undefined way, I'll 4 add, because you still cannot tell me what portions 5 of the topics he's prepared to testify on today. 6 Can you tell me right now? 7 MS. YBARRA: Are you finished? 8 MR. ERCOLINI: Can you tell me right now? I 9 want an answer to what portions of the topics is he 10 prepared to testify on, which is he not. 11 MS. YBARRA: I'll caution you to watch your 12 tone with me and stop interrupting me. Are you 13 finished? 14 MR. ERCOLINI: I'm not talking. I just asked 15 a question. Can you answer the question? 16 MS. YBARRA: Yes. And we responded in writing 17 this morning, again, pointing you to the chart -- 18 let me finish, Mr. Ercolini -- the chart submitted 19 to the Court reflecting the scope of what we agreed 20 to provide Mr. Shafiei to testify on, and in 21 addition to that, Topic 36 which was ordered by 22 Judge Cabell at the hearing. The chart sets forth 23 the scope of what Google is willing to provide a 24 witness on. 25 We discussed this explicitly with the judge at</p>

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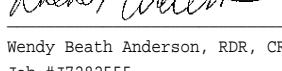
<p style="text-align: right;">Page 13</p> <p>1 the hearing and the judge had reviewed the chart 2 and he said -- you know, you need to look back at 3 the hearing transcript -- and he said Google has 4 been willing to make somebody available to talk 5 about certain things and information, referring to 6 the chart. Singular, at that hearing you said that 7 the issues that -- the motions had been resolved 8 and we moved forward to talk about another one.</p> <p>9 MR. ERCOLINI: I did not say the motions were 10 resolved.</p> <p>11 MS. YBARRA: Mr. Ercolini --</p> <p>12 MR. ERCOLINI: You're not going to pile lie 13 upon lie. That's not our agreement. That's your 14 chart saying what you're willing to provide him 15 for. I asked you to provide where we agreed to 16 that scope.</p> <p>17 MS. YBARRA: Counsel has just called me a liar 18 on the record and I think we -- I think --</p> <p>19 MR. ERCOLINI: Oh, my God.</p> <p>20 MS. YBARRA: -- we're done here.</p> <p>21 MR. ERCOLINI: No, I said you piled lie upon 22 lie, which is absolutely true. If you're yanking 23 the witness because you're offended by my saying 24 that you're lying, I'd ask you to stop telling 25 falsehoods on the record.</p>	<p style="text-align: right;">Page 15</p> <p>1 what the scope is right now. Tell me what the 2 scope is right now.</p> <p>3 MS. YBARRA: This is the -- Mr. Ercolini, 4 every time I speak, you interrupt me. You've now 5 called me a liar, you've interrupted me a dozen 6 times on the record. Please watch yourself.</p> <p>7 MR. ERCOLINI: I asked you four times please 8 tell me what the scope is.</p> <p>9 MS. YBARRA: The scope is memorialized in 10 Chris Sun's e-mail from this morning, plus your 11 prior correspondence.</p> <p>12 MR. ERCOLINI: Let's read through the e-mail, 13 then, and find what the scope is.</p> <p>14 MS. YBARRA: I think we're done here.</p> <p>15 MR. ERCOLINI: No, I don't think we're done. 16 We're going to get this on the record. We're going 17 to read through Chris Sun's e-mail and you're going 18 to point to me where the scope is.</p> <p>19 MS. YBARRA: Absolutely. In the attachment to 20 Chris Sun's e-mail this morning, and as 21 memorialized in our July 2nd letter, and as 22 discussed multiple times in meet-and-confers by the 23 parties, I'm going to read this into the record and 24 you will not interrupt me, Mr. Ercolini.</p> <p>25 MR. ERCOLINI: What meet-and-confers?</p>
<p style="text-align: right;">Page 14</p> <p>1 So I want you to tell me where we agreed to 2 the scope that you said is in Exhibit D.</p> <p>3 MS. YBARRA: Mr. Ercolini, we've stated our 4 position in writing and now again on the record. I 5 think we're ready to suspend today's deposition.</p> <p>6 MR. ERCOLINI: You have not provided an answer 7 to that question.</p> <p>8 MS. YBARRA: You've interrupted me now a tenth 9 time.</p> <p>10 MR. ERCOLINI: This is my deposition --</p> <p>11 MS. YBARRA: We're ready to suspend the 12 deposition.</p> <p>13 MR. ERCOLINI: -- which you are grandstanding.</p> <p>14 MS. YBARRA: We're going to seek guidance from 15 the Court on this. Are you ready to go you off the 16 record?</p> <p>17 MR. ERCOLINI: What's that? No, I want to ask 18 the witness questions.</p> <p>19 MS. YBARRA: We are not going to proceed with 20 today's deposition absent an agreement from 21 Singular to abide by the scope that we have -- that 22 has been in place for weeks. I understand that 23 you're --</p> <p>24 MR. ERCOLINI: There's no scope in place 25 because you can't even tell me what it is. Tell me</p>	<p style="text-align: right;">Page 16</p> <p>1 MS. YBARRA: Mr. Ercolini --</p> <p>2 MR. ERCOLINI: You're not going to make 3 grandstanding statements.</p> <p>4 MS. YBARRA: -- you asked for the scope.</p> <p>5 MR. ERCOLINI: When did we meet and confer 6 about Exhibit D?</p> <p>7 MS. YBARRA: You asked me about the scope. 8 I'm going to read that into the record. Do you 9 want that or not?</p> <p>10 MR. ERCOLINI: You're saying that we agreed 11 to. I'm asking you to tell me where we agreed to 12 that scope.</p> <p>13 MS. YBARRA: We discussed this at length at 14 the hearing with Judge Cabell.</p> <p>15 MR. ERCOLINI: We discussed a motion to compel 16 testimony of this witness -- of Google on a number 17 of topics. Where did we say we agree to the scope 18 in Exhibit D?</p> <p>19 MS. YBARRA: At the hearing, the June 30th 20 hearing before Judge Cabell.</p> <p>21 MR. ERCOLINI: I got the setting.</p> <p>22 MS. YBARRA: Mr. Ercolini --</p> <p>23 MR. ERCOLINI: You need to tell me where in 24 the transcript --</p> <p>25 MS. YBARRA: -- every time I try to answer</p>

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<p style="text-align: right;">Page 17</p> <p>1 your question, you interrupt me.</p> <p>2 MR. ERCOLINI: No, we agreed to a general time</p> <p>3 when apparently we did it. I'm asking you to tell</p> <p>4 me the specific time where we said yeah, we agree</p> <p>5 to the scope in Exhibit D.</p> <p>6 MS. YBARRA: Are you going to let me finish?</p> <p>7 MR. ERCOLINI: I'm going to ask you over and</p> <p>8 over again to tell me where we agreed to the scope</p> <p>9 of Exhibit D. You said in multiple</p> <p>10 meet-and-confers. When did those meet-and-confers</p> <p>11 happen?</p> <p>12 MS. YBARRA: Mr. Ercolini, at the hearing</p> <p>13 before Judge Cabell, Singular indicated to the</p> <p>14 Court that its motions had been resolved as a</p> <p>15 result of the agreements that we put on the record,</p> <p>16 which was Google agreed to produce a witness</p> <p>17 consistent with the scope reflected in Exhibit D.</p> <p>18 MR. ERCOLINI: And that's what Matt said he</p> <p>19 was willing to produce a witness in accordance with</p> <p>20 the scope of Exhibit D.</p> <p>21 MS. YBARRA: That is what he represented to</p> <p>22 the Court at the hearing.</p> <p>23 MR. ERCOLINI: You were ordered to provide</p> <p>24 testimony on the average cost of data centers. You</p> <p>25 were ordered to provide testimony to the extent it</p>	<p style="text-align: right;">Page 19</p> <p>1 MR. ERCOLINI: You're saying that was the</p> <p>2 exclusion of all other topics.</p> <p>3 MS. YBARRA: Absolutely not. I've made my</p> <p>4 position clear. I'm trying to -- Mr. Ercolini,</p> <p>5 again, quit interrupting. You're being extremely</p> <p>6 rude, unprofessional. I tried to read the topics</p> <p>7 into the record.</p> <p>8 MR. ERCOLINI: You want to talk --</p> <p>9 MS. YBARRA: We're done here. We're ready to</p> <p>10 go off the record. We're ready to go off the</p> <p>11 record. We're going to suspend the deposition.</p> <p>12 MR. ERCOLINI: Okay. Again, you're doing that</p> <p>13 unilaterally. We've noticed him. You've failed to</p> <p>14 appear for the deposition. That's how we're taking</p> <p>15 it. And to the extent you failed to respond to the</p> <p>16 topics -- and there are a number of topics for</p> <p>17 which there are no designations -- those are also</p> <p>18 failures to appear. And there's a failure to</p> <p>19 appear from Friday for all topics for which the</p> <p>20 witness was not prepared. That's three.</p> <p>21 So if you want to do that, that's up to you.</p> <p>22 But it's 12:44. We've been going for 40 minutes</p> <p>23 now, and I haven't gotten a single question in.</p> <p>24 I'd like really like to start the deposition.</p> <p>25 MS. YBARRA: We're not proceeding with the</p>
<p style="text-align: right;">Page 18</p> <p>1 exists on incremental references or any other</p> <p>2 segment that uses the accused TPUs. We did not</p> <p>3 withdraw any of the topics. Those have been</p> <p>4 noticed. You've been aware of them for quite some</p> <p>5 time and there's no motion for protective order.</p> <p>6 You designated him on those topics. I can't</p> <p>7 think this is anything but a bait-and-switch that</p> <p>8 you designated him on the topics and then you</p> <p>9 pulled him. You did the same thing on Friday.</p> <p>10 This is completely inappropriate. You're not</p> <p>11 allowed to say we object to the topics, therefore,</p> <p>12 we're not going to produce somebody.</p> <p>13 In the absence of a protective order, you're</p> <p>14 taking the witness -- having him fail to appear is</p> <p>15 sanctionable. If you want to go down that road, we</p> <p>16 can do that. We've not renegeed on a single thing.</p> <p>17 You've not pointed me to a single thing where we've</p> <p>18 agreed to the scope you're suggesting. It's</p> <p>19 nowhere in the record.</p> <p>20 MS. YBARRA: That's just false, Mr. Ercolini.</p> <p>21 And Mr. Shafiei is prepared to testify on Topic 36,</p> <p>22 which is a clear holding that came out of the</p> <p>23 June 30th hearing. Judge Cabell ordered Google to</p> <p>24 provide a witness on that and Mr. Shafiei's</p> <p>25 prepared to testify on that.</p>	<p style="text-align: right;">Page 20</p> <p>1 deposition today. Singular's intent to re-litigate</p> <p>2 issues that were already discussed with the Court</p> <p>3 and have been decided --</p> <p>4 MR. ERCOLINI: Listen, you can just object and</p> <p>5 say it's out of scope, and if you don't want the</p> <p>6 witness to testify on it, he won't testify on it.</p> <p>7 MS. YBARRA: We're ready to go off the record.</p> <p>8 Mr. Ercolini, I've made my position clear. I think</p> <p>9 you have too. We're going to have to take it up</p> <p>10 with the judge.</p> <p>11 MR. ERCOLINI: Okay. Well, that's the third</p> <p>12 failure to appear inside of a week. So feel free</p> <p>13 to take it up with the judge. This is completely</p> <p>14 inappropriate. We're three days out from the close</p> <p>15 of fact discovery and this is the nth month that</p> <p>16 Google has failed to produce a witness on these</p> <p>17 topics.</p> <p>18 So if you're going to pull the witness, I'll</p> <p>19 go off line. I'm not going to do it first. I'm</p> <p>20 waiting to question the witness. By the way, I'm</p> <p>21 not counting any of this against our time.</p> <p>22 MS. YBARRA: Madam court reporter, we're ready</p> <p>23 to go off the record.</p> <p>24 THE VIDEOGRAPHER: Do all parties agree to go</p> <p>25 off the video record?</p>

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1	MR. ERCOLINI: I don't. So you're going to	1 CERTIFICATE OF OATH
2	have to shut it off. Shut off your video if you're	2 STATE OF FLORIDA
3	going to pull the witness, but I'm going to go	3 COUNTY OF PALM BEACH
4	ahead and question the witness.	4
5	MS. YBARRA: No, we're not proceeding with	5
6	today's deposition in light of Singular's intent to	6 I, the undersigned authority, certify that
7	re-litigate issues.	7 Kamran Shafiei personally appeared before me and was
8	Thereupon,	8 duly sworn on the 20th day of July, 2021.
9	(KAMRAN SHAFIEI)	9
10	having been first duly sworn or affirmed, was examined	10 Witness my hand and official seal this 20th
11	and testified as follows:	11 day of July, 2021.
12	DIRECT EXAMINATION	12
13	BY MR. ERCOLINI:	13
14	Q. Mr. Shafiei, do you understand that you're	14
15	appearing today as a 30(b)(6) witness?	15
16	MS. YBARRA: Mr. Ercolini, I think your	16
17	manners are really wanting here.	17 Wendy Beath Anderson, RDR, CRR, CRC
18	MR. ERCOLINI: I think you need to stop with	18 Notary Public State of Florida
19	the speaking objections.	19 My Commission Expires: 9/20/2021
20	MS. YBARRA: You're being unprofessional.	20 My Commission No.: GG 109736
21	BY MR. ERCOLINI:	21 Job #J7282555
22	Q. Mr. Shafiei --	22
23	MS. YBARRA: We're done today. Thank you.	23
24	Mr. Shafiei, we're going to leave. We're	24
25	going to exit the room. Thank you.	25
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1	MR. ERCOLINI: All right.	1 C E R T I F I C A T E
2	THE VIDEOGRAPHER: Going off the video record	2
3	at 9:46 a.m.	3 STATE OF FLORIDA
4	(Deposition was adjourned at 9:46 a.m.)	4 COUNTY OF PALM BEACH
5		5
6		6 I, Wendy Beath Anderson, Certified Realtime
7		7 Reporter and Notary Public in and for the State of
8		8 Florida at Large, do hereby certify that I was
9		9 authorized to and did stenographically report said
10		10 deposition of KAMRAN SHAFIEI; that a review of the
11		11 transcript was not requested; and that the foregoing
12		12 transcript is a true record of my stenographic notes.
13		13 I FURTHER CERTIFY that I am not a relative,
14		14 employee, or attorney, or counsel of any of the parties,
15		15 nor am I a relative or employee of any of the parties'
16		16 attorney or counsel connected with the action, nor am I
17		17 financially interested in the action.
18		18 The foregoing certification of this transcript
19		19 does not apply to any reproduction of the same by any
20		20 means unless under the direct control and/or direction
21		21 of the certifying reporter.
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	Page 24	
16	Dated this 20th day of July, 2021.	16
17		17
18		18
19	Wendy Beath Anderson, RDR, CRR, CRC	19
20	Job #J7282555	20
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